

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
TERRY GEXLER)	
Plaintiff)	
)	
v.)	<u>Civil Action No. 04-12305RGS</u>
)	
UNITED PARCEL SERVICE, INC.)	
Defendant)	
_____)	

**JOINT STATEMENT IN PREPARATION
FOR SCHEDULING CONFERENCE**

Pursuant to Local Rule 16.1, the following is the Joint Statement of both parties in preparation for the Scheduling Conference in the above referenced case:

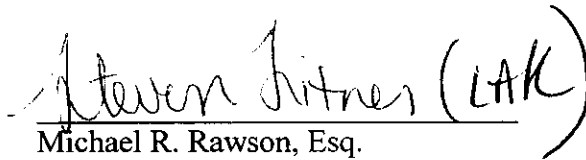
I. Proposed Discovery Plan

- a. Initial Disclosure due by February 24, 2005;
- b. All motion to amend or supplement shall be filed by March 24, 2005;
- c. All fact discovery shall be served by June 1, 2005 and completed by July 1, 2005;
- d. All expert witnesses on behalf of the plaintiff shall be designated in accordance with the Federal Rules of Civil Procedure and the Local rules by August 1, 2005;
- e. All experts who may be witnesses on behalf of UPS shall be designated by September 15, 2005;
- f. All expert depositions shall be completed by November 1, 2005; and
- g. All dispositive motions shall be filed by December 1, 2005.

II. Certification

Parties will be filing these certifications individually.

Terry Gexler
By his attorneys,



Michael R. Rawson, Esq.
Steven M. Litner, Esq.
Rawson Merrigan & Merrigan, LLP
530 Atlantic Avenue, 3rd Floor
Boston, MA 02210
617-348-0988

United Parcel Service Inc.
By its attorneys,



Hugh F. Murray, III, BBO# 557175
Laurie Alexander-Krom, BBO# 637385
Murtha Cullina LLP
99 High Street
Boston, MA 02110
617-457-4000

Date: January 13, 2005